

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

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In re:	:	Chapter 11
	:	
Zohar III, Corp., <i>et al.</i> ,	:	Case No. 18-10512 (KBO)
	:	
Debtors.	:	Jointly Administered
	:	

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

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LYNN TILTON; PATRIARCH PARTNERS  
VIII, LLC; PATRIARCH PARTNERS XIV,  
LLC; PATRIARCH PARTNERS XV, LLC  
OCTALUNA, LLC; OCTALUNA II, LLC;  
AND OCTALUNA III, LLC,

Appellants,

v.

MBIA INC., MBIA INSURANCE  
CORPORATION, U.S. BANK, N.A.,  
ALVAREZ & MARSAL ZOHAR  
MANAGEMENT, CREDIT VALUE  
PARTNERS, LP; BARDIN HILL  
INVESTMENT PARTNERS LP F/K/A  
HALCYON CAPITAL MANAGEMENT LP,  
COÖPERATIEVE RABOBANK U.A.,  
VÄRDE PARTNERS, INC., ASCENSION  
ALPHA FUND LLC, ASCENSION HEALTH  
MASTER PENSION TRUST, CAZ  
HALCYON OFFSHORE STRATEGIC  
OPPORTUNITIES FUND, L.P., CAZ  
HALCYON STRATEGIC OPPORTUNITIES  
FUND, L.P., BROWN UNIVERSITY, HCN  
LP, HALCYON EVERSOURCE CREDIT  
LLC, HLF LP, HLDR FUND I NUS LP,

Case No. 1:22-cv-00400 (TLA)

HLDR FUND I TE LP, HLDR FUND I UST :  
LP, HALCYON VALLÉE BLANCHE :  
MASTER FUND LP, BARDIN HILL EVENT- :  
DRIVEN MASTER FUND, L.P., PRAETOR :  
FUND I, A SUB FUND OF PRAETORIUM :  
FUND I ICAV; HIRTLE CALLAGHAN :  
TOTAL RETURN OFFSHORE FUND :  
LIMITED; HIRTLE CALLAGHAN TOTAL :  
RETURN OFFSHORE FUND II LIMITED; :  
HIRTLE CALLGHAN TRADING :  
PARTNERS, L.P.; AND THIRD SERIES OF :  
HDML FUND I LLC, :  
Appellees. :  
\_\_\_\_\_ :

**MOTION AND ORDER FOR ADMISSION PRO HAC VICE**

Pursuant to Local Rule 83.5 and the attached certification, counsel moves the admission pro hac vice of Robert Franciscovich, Esq. of the law firm Arnold & Porter Kay Schoeler LLP, 250 West 55th Street, New York, NY 100119-9710, to represent Defendants, the Zohar III Controlling Class, in the above-captioned action.

Dated: April 21, 2022

/s/ Morgan L. Patterson  
Matthew P. Ward (Del. Bar No. 4471)  
Morgan L. Patterson (Del. Bar No. 5388)  
WOMBLE BOND DICKINSON (US) LLP  
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*Counsel to the Zohar III Controlling Class*

**ORDER GRANTING MOTION FOR ADMISSION PRO HAC VICE**

IT IS HEREBY ORDERED counsel's motion for admission pro hac vice is granted.

Date: April \_\_, 2022

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The Honorable Thomas L. Ambro  
United States District Judge

**CERTIFICATION BY COUNSEL TO BE ADMITTED PRO HAC VICE**

Pursuant to Local Rule 83.5, I certify that I am eligible for admission to this Court, am admitted, practicing and in good standing as a member of the Bar of the State of New York and District of Columbia and the U.S. District Court for the Eastern and Southern District of New York, and the United States Court of Appeals for the Second Circuit, Fourth Circuit, and Tenth Circuit, and pursuant to Local Rule 83.6 submit to the disciplinary jurisdiction of this Court for any alleged misconduct which occurs in the preparation or course of this action. I also certify that I am generally familiar with this Court's Local Rules. In accordance with Standing Order for District Court Fund effective August 31, 2016, I further certify that the annual fee of \$25.00 has been paid to the Clerk of Court, or, if not paid previously, the fee payment will be submitted to the Clerk's Office upon the filing of this motion.

Dated: April 21, 2022

/s/ Robert Franciscovich  
Robert Franciscovich  
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*Counsel to the Zohar III Controlling Class*